

HARTMAN UNDERHILL & BRUBAKER LLP

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Solicitor for the City of Lancaster  
Bureau of Police

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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

KATHERINE ELIZABETH NEIMER	:	
a minor, by and through JAMES J. NEIMER	:	
and REBECCA NEIMER, her parents and	:	
natural guardians,	:	
Plaintiffs,	:	
v.	:	CI-02-CV-4034
	:	
CITY OF LANCASTER; LANCASTER	:	JURY TRIAL DEMANDED
RECREATION COMMISSION; and	:	
ISMAEL ALVAREZ,	:	
Defendants.	:	

**ANSWER OF THE BUREAU OF POLICE OF THE CITY OF LANCASTER  
TO PLAINTIFFS' AMENDED MOTION  
TO COMPEL PRODUCTION OF DOCUMENTS**

1-4. Admitted. The City of Lancaster Bureau of Police has not produced the records of its investigation in this case because of the provisions of the Criminal History Record Information Act, 18 PS § 9101 et seq., as more fully set forth in the Memorandum accompanying this Answer.

5. Neither admitted or denied. The Bureau of Police has no knowledge of the relevancy of the documents subject to the subpoena to the above captioned law suit.

Dated: \_\_\_\_\_, 2003

HARTMAN UNDERHILL & BRUBAKER LLP

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Christopher S. Underhill  
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**PROOF OF SERVICE**

I HEREBY CERTIFY that I am this day serving the foregoing Answer of the Bureau of Police of the City of Lancaster to Plaintiffs' Amended Motion to Compel Production of Documents on the persons and in the manner indicated below.

Service by First Class Mail, addressed as follows:

Jeffrey R. Elliott, Esquire  
Kozloff Stoudt  
2640 Westview Drive  
P.O. Box 6286  
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1735 Market Street  
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Dated: \_\_\_\_\_, 2003

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